

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

**U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION,**

**Plaintiff,**

**V.**

# EASTERN JANITORIAL SERVICES,

**Defendant.**

**CIVIL ACTION NO. 3:24-cv-06474**

**Judge Zahid N. Quraishi**

**JOINT MOTION FOR ENTRY OF CONSENT DECREE**

Plaintiff U.S. Equal Employment Opportunity Commission (the “Commission” or “EEOC”) and Defendant Eastern Janitorial Services (“Defendant”) respectfully move the Court for approval and entry of the attached Consent Decree (Exhibit 1). In support of the Motion, the parties state as follows:

1. The Commission and Defendant have negotiated the attached Consent Decree as a resolution of the Commission's claims in the above-captioned case.
2. The Commission and Defendant believe that the terms of this Consent Decree are adequate, fair, reasonable, equitable and just.
3. The Commission and Defendant believe that the Consent Decree conforms with the Federal Rules of Civil Procedure and is not in derogation of the rights or privileges of any person. The entry of this Consent Decree will further the objectives of the Title VII of the Civil Rights Act of 1964, as amended, and will be in the best interests of the parties and the public.

Respectfully submitted,

U.S. EQUAL EMPLOYMENT  
OPPORTUNITY COMMISSION

/s/ Nina Menniti

Nina Menniti  
Senior Trial Attorney  
Pennsylvania Bar No. 326828  
EEOC – Pittsburgh Area Office  
1000 Liberty Avenue, Suite 1112  
Pittsburgh, PA 15222  
(412) 588-6909  
(412) 395-5749 (facsimile)  
nina.menniti@eeoc.gov

*Counsel for Plaintiff EEOC*

Eastern Janitorial Services

/s/ Brenton J. LaMaire

Brenton J. LaMaire, Esq.  
Attorney  
New Jersey Bar No. 249472020  
The Law Office of John Carrino, LLC  
53 Old Turnpike Rd., PO Box 54  
Oldwick, NJ 08858  
(908) 800-0515  
(908) 800-0515 (facsimile)  
blamaire@carrinolaw.com

*Counsel for Defendant Eastern Janitorial Services*